INTERNATIONAL [redacted]

INTERNATIONAL
RTTY DX
ASSOCIATION

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Secretary FCC
Washington, DC 20554

Ref: RM-8218

The International RTTY DX Association would like to make known its opposition to certain provisions of the ARRL Petition for Rule Making RM-8218.

The International RTTY DX Association is an organization of approximately 300 Amateur Radio Operators from around the world. We specialize in making contacts on the HF bands with fellow Amateur Radio Operators in distant and rare countries . . . utilizing Badot (RTTY) digital code. Our members include those who simply pursue contacts with rare countries (RTTY DXers) and those who pursue rare countries during contests (RTTY DX Contesters).

Those of us actively engaged, recognize several important practical aspects of digital DXing:

A — With only the most minute exception, Baudot (RTTY) is the DX mode of choice. It is the only digital mode in which a DX station can quickly recognize, or piece together individual call signs and effect contacts in weak signal/large pileup situations. It is also the only digital mode in which contacts can be made at a rate approximating that of CW or SSB.

B — Weak signal RTTY DX cannot be worked effectively in close proximity to burst mode (AMTOR/PACTOR, Clover or Packet) signals.

C — AMTOR/PACTOR and Clover station operators frequently fail to hear or recognize that a particular frequency is in use by a weak RTTY station. An automatic mode AMTOR, PACTOR or Clover contact on frequency or nearby will cause fatal interference to any ongoing RTTY weak signal contact. Unfortunately, there is no way to interrupt the automatic contact to advise the stations of their interference.

D — Many AMTOR/PACTOR and Clover operators use AFSK modulation. If improperly adjusted with excessive drive, their transmitters generate spurious responses for many kHz on each side of their center frequency, effectively blocking any other use of the RTTY band. Again, there is no way to interrupt the communication to advise the errant station of the improper operation or regain use of the RTTY frequencies.

As RTTY DXers and RTTY Contesters with daily and intimate experience with the actual operating conditions, we object to the following provisions of RM-8218:

1.0 — RM-8218 would reduce the 14080-099.5 kHz band presently used by RTTY DXers and Contesters by 25% at a time when RTTY DX is rapidly gaining popularity.

1.1 — DX expeditions to rare countries presently work four to five times more RTTY DXers than just a few years ago. In the Los Angeles metro area, the number of active RTTY DXers has risen from five in 1987 to more than 42 at present . . . an 800% increase. Many are SSB and CW DXers who have fulfilled their band/country totals, accepting RTTY DX as a new challenge.

1.2 — Crowding RTTY into the 14080–095 kHz segment will cause confrontations with automatic station operators. In major pileups, RTTY DXers outside the US will spread upward above 14095, to 14099.5 kHz. The usual reaction is for the offended Packet operators to begin jamming the DX.

1.3 — RM-8218 would place automatic "burst mode" (AMTOR/PACTOR, Clover and Packet) stations in the United States, directly on top of RTTY DX operations in other parts of the world. In addition to producing un-necessary "ugly American" interference, the DX operations may not be workable by RTTY DXers/Contesters in the US, Canada, Latin, or South America.

1.4 — RM-8218 would force all automatic AMTOR/PACTOR, Clover and Packet stations into the 14095–112 kHz segment. As presently configured these incompatible modes recognize other signals only as noise and will key up on each other. The operators of these stations would seek refuge from the resulting bedlam and move into the RTTY band. From a technical standpoint, RTTY, AMTOR/PACTOR, Clover and Packet should be segregated.

1.5 — If additional frequencies are needed for 20 meter traffic handling, we strongly suggest placing Clover and Packet in the 14100–110 kHz segment. Under competitive pressure, HF Packet will be quickly replaced by the technically superior Clover as the preferred traffic handling mode.

2.0 — RM-8218 would reduce the 21080-100 RTTY segment 50% (to just 10 kHz) while the popularity of RTTY DX is growing and the adjacent 100 kHz wide Novice band is generally lightly used or vacant.

2.1 — As detailed in paragraph 1.1, the popularity of RTTY DXing and Contesting is growing at a very rapid rate.

2.1 — Crowding RTTY into 10 kHz will cause major confrontations with automatic station operators and users when DX pileups spread upward to 21100 kHz.

2.3 — RM-8218 would place automatic "burst mode" (AMTOR/PACTOR, Clover and Packet) stations in the United States, directly on top of RTTY DX operations in other parts of the world. For example, the 21090-100 kHz segment,, heavily used by RTTY DXers and Contesters in Asia and Europe during the daily trans-equatorial opening, will be subjected to unwanted interference from the US.

In addition to producing un-necessary interference, those DX operations would probably not be workable by RTTY DXers and Contesters in the US, Canada, Latin and South America.

2.4 — RM-8218 would force all automatic AMTOR/PACTOR, Clover and Packet stations into the 21090–100 kHz segment. The result of this action would be identical to that detailed in Paragraph 1.4 above.

2.5 — If additional frequencies are needed for 15 meter traffic handling, we strongly suggest expanding the digital band upward to 21120 kHz (the 100 kHz Novice band is very lightly used at present). An alternative would be to allow Clover and Packet to share the 21100–110 kHz segment until HF Packet is replaced by the technically superior Clover.

3.0 — RM-8218 does nothing to stop the unfortunate practice of using burst modes (AMTOR/PACTOR or Clover) in the RTTY DX band. In just two days in April of this year, three major DX operations were spoiled by PACTOR stations keying up on top of weak signal DX stations. A "good" band plan would separate the modes.

IRDXA hopes consideration will be given to the objections you receive from those actually using the RTTY frequencies on a daily basis. No others are in a position to offer more valid opinions.

For the membership,

14 May 93

Donald J. Simon, W6PQS

cc: American Radio Relay League